

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA
Plaintiff,

v.

BRIAN BRIONI CASTELLANO (2)
Defendant.

Criminal no. 21-173 (ADC)

**MOTION REQUESTING AUTHORIZATION TO TRAVEL
TO THE HONORABLE COURT:**

Comes now the defendant, Mr. Brioni Castellano, and respectfully states and prays as follows:

1. The government has provided various discovery packages depicting what it intends to use in its case against Mr. Brioni Castellanos.
2. The events depicted in the provided discovery occurred in the town of Hatillo.
3. Furthermore, Mr. Castellanos resides in the town of Cataño.
4. In order to weigh the strength of the government's case and the subsequent plea offer, it is necessary for the undersigned to travel to these locations to identify investigate the matter, and to identify any potential mitigating evidence that may assist in the guilt and sentencing stages of this case.
5. In accordance to the rules of the Court, authorization must be requested for CJA counsel to travel outside of the metropolitan area.

WHEREFORE, the undersigned respectfully requests that the Court take note of the current information and authorize the motion to travel.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th day of September 2021.

I HEREBY CERTIFY, that on this date the present document has been filed electronically and is available for viewing and downloading from the Court's CFM/ECF system by U.S. Attorney's Office.

s/ *Diego H. Alcalá Laboy*
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